

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

NATIONAL FAIR HOUSING
ALLIANCE, *et al.*,

Plaintiffs,

v.

BANK OF AMERICA, N.A., *et al.*,

Defendants.

Case No.: 1:18-CV-1919

**DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT ON AVAILABLE REMEDIES**

Defendants Bank of America, N.A. (“Bank of America”) and Safeguard Properties Management, LLC (“Safeguard”) (together, “Defendants”), through undersigned counsel and pursuant to Federal Rule of Civil Procedure 56, hereby respectfully move for summary judgment in their favor, in whole or in part, on the organizational Plaintiffs’ claims for various remedies, including monetary damages and injunctive relief, and on grounds of lack of personal jurisdiction over the claims of the organizational Plaintiffs other than the first-named Plaintiff. The grounds and authorities in support of this Motion are set forth in the accompanying Memorandum of Law in Support of Defendants’ Motion for Summary Judgment on Available Remedies, and accompanying exhibits, which are incorporated as though fully set forth herein.

WHEREFORE, Defendants respectfully request that their Motion be granted, that summary judgment be entered in their favor, in whole or in part, on Plaintiffs’ damages claims.

[Signatures follow on the next page]

Respectfully submitted this 19th day of April, 2024,

/s/ David M. Holmes

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***Counsel for Defendants Bank of America,
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 19, 2024, a copy of the foregoing *Defendants' Motion for Summary Judgment on Available Remedies, Memorandum of Law in Support, Declaration, Appendix of Exhibits, and Proposed Order* were filed and served via the Court's CM/ECF system, on all counsel of record.

/s/ Melissa O. Martinez
Melissa O. Martinez